



101 6th Avenue
New York, NY 10013

acabrera@constangy.com
646.341.6536

October 20, 2021

VIA ECF

The Honorable Steven I. Locke
United States Magistrate Judge
United States District Court for the Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

**Re: Maria Suarez v. Southern Glazer's Wine and Spirits of New York, LLC, Case No.
2:19-cv-07271-GRB-SIL**

The Honorable Steven I. Locke:

I am lead counsel for Defendant Southern Glazer's Wine and Spirits of New York, LLC in this case and will be responsible for taking Plaintiff Maria Suarez's deposition. Unfortunately, the parties could not find a date the week of October 25 where all parties and counsel were available. I had a death in my family and need to travel to California for memorial services the week of November 1. Parties and counsel are available November 11 for the deposition. I therefore respectfully request a brief extension of the deposition deadline to **November 11**.

The current deposition deadline is October 31, 2021, and the Court ordered Ms. Suarez's deposition to held on or before October 28, 2021. Plaintiff consents to this request. There have been three prior extension requests (see Doc. Nos. 20, 22, 24), but none of those requests were made by Defendant.

Thank you for Your Honor's consideration of the above request.

Sincerely,

s/ Anjanette Cabrera

Anjanette Cabrera